



275795

Lang, Annette

From: Lang, Annette
Sent: Wednesday, August 07, 2002 5:07 PM
To: melodia.craig@epa.gov; dnorthrop@porterwright.com; Gfranke@one.net; lawyers@phillipslawfirm.com; conte@blankrome.com; mocallag@slk-law.com; msnyder@slk-law.com
Subject: notice of deposition



#562042 WPD

gary,

i have attached a notice of the continuation of the deposition of dick clarke. the continuation is scheduled for august 20, 2002, at 9:30 am. in your voice mail to me, you did not indicate that mr. clarke was unavailable. instead, you indicated that you probably would be at trial. in light of the fact that your brother and Mr. Bristol have filled in for you in the past, and that, for at least 45 minutes during the previous day of testimony of mr. clarke, you were on a conference call involving another matter, it does not seem to me that your personal attendance at this continuation deposition is necessary. it will impose expense and burden on the united states for this continuation not to go forward. specifically, i will already be in cincinnati for the deposition of thomas clarke on august 19, 2002, and, as i have advised you in the past, it is very expensive for the government to send me to cincinnati for just one deposition.

Annette

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THE DOW CHEMICAL CO., <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action Nos.
)	C-1-97-0307; C-1-97-0308
ACME WRECKING CO., INC., <u>et al.</u> ,)	(Consolidated Actions)
)	
Defendants.)	C-1-01-439
)	(Transferred Action)
<hr/>		
THE DOW CHEMICAL CO., <u>et al.</u>)	
)	Judge Weber
Plaintiffs,)	
)	
v.)	
)	
SUN OIL COMPANY, d/b/a SUNOCO)	
OIL CORP., <u>et al.</u> ,)	
)	
Defendants.)	
<hr/>		
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
AERONCA, INC., <u>et al.</u>)	
)	
Defendants.)	
)	

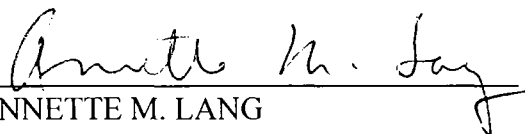
Notice is hereby given, pursuant to Rule 30 of the Federal Rules of Civil Procedure, that Plaintiff the United States of America (“United States”) will continue the deposition of the Richard M. Clarke at 9:30 a.m. on August 20, 2002, at the law firm of Taft, Stettinius & Hollister

located at 425 Walnut St., Suite 1800 (reception), Cincinnati, Ohio. The depositions will be conducted on the 20th Floor, in the Gamble Room. If necessary, the deposition will be continued until 8:30 a.m. on August 21, 2002.

These depositions will be recorded by stenographic means.

Respectfully submitted,

Thomas L. Sansonetti
Assistant Attorney General
Environment & Natural Resources Div.
U.S. Department of Justice


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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2002, I caused a true copy of the foregoing NOTICE OF DEPOSITION OF RICHARD M. CLARKE to be served by first-class mail, postage prepaid upon the following counsel of record:

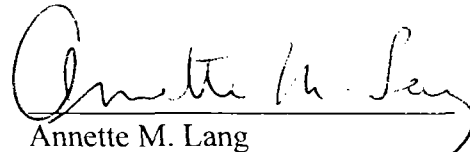
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Annette M. Lang